



State of Arizona  
**Department of Education**

**Tom Horne**  
Superintendent of  
Public Instruction

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**MEMORANDUM**

To: Administrators, National School Lunch and Breakfast Programs

From: Lynne Dulin, Director  
Child Nutrition Program

Holly Mohr, Team Leader  
Child Nutrition Program

Subject: Meals Served to Students Placed in Schools Not Participating in the National School Lunch Program

This memo serves to address pupil placement and the effects it has on meal benefits and reimbursement when students are placed in a school that does not participate in the National School Lunch Program.

- When a public school district places children in specials schools or institutions, which is also known as “pupil placement”, are the meals eligible for reimbursement?  
**That depends on if the schools are eligible to participate in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP).** *USDA will only reimburse those meals served to children in an “eligible” school that participates in the NSLP and/or the SBP.*
- **What is an “eligible” school?**  
An “eligible” school is defined as any public or nonprofit private school of high school grade or under, and any public or licensed nonprofit private residential child care institution. NSLP and SBP regulations found at 7 CFR 210.2 and 220.2 require that, in the case of public or nonprofit private schools and institutions, they must be recognized as part of the educational system in the State in order to be eligible. ***Profit schools/institutions are not eligible to participate in the NSLP/SBP.***

□ **What is “pupil placement”?**

When a public school is unable to provide needed services directly to children, it may contract with a school to provide the needed educational services. For example, public school districts may place children who are discipline problems in an alternative school or place disabled children in a specialized school.

Under the terms of these contracts, the child’s public school district (home district) pays the tuition to the school in which it places the student. Although the home district may still consider these children “enrolled” and may include them in its State education funding formula, the children spend their entire school day at the placement school. Sometimes children from more than one public school district, or even more than one State, may use the services of a single school.

□ **Can meals served to children in pupil placement situations be claimed for reimbursement?**

The school that serves the meal must participate in the NSLP/SBP in order to claim reimbursement for the meals.

The placement school, the home district, or another participating school may **not** claim the meal for reimbursement if the school that serves the meal:

- Is not eligible to participate in the NSLP/SBP, or
- Chooses not to participate in the NSLP/SBP

This applies even if the home district or other participating school provides the meal to be served at the ineligible school.

□ **Are there special considerations for pupil placement for students with disabilities?**

No. As previously mentioned, the school or district may claim reimbursement for meals only when the school that serves the meal participates in the NSLP/SBP.

□ **Are there any situations that would accommodate off-site consumption?**

Yes. These situations are limited to meals served on supervised field trips and work-study programs. The home school cannot provide and claim a sack lunch every day for a pupil placement student attending classes at a nonparticipating or ineligible school. For example, a class goes on a field trip and the school provides sack lunches for that particular day. The school can receive reimbursement for the sack lunches. If a school is providing a sack lunch everyday for the student(s) attending a different school that does not participate in the NSLP, the meal(s) cannot be reimbursed.

□ **What alternatives should schools consider for students placed in nonparticipating schools?**

If a school district places students in a school that is not participating in the NSLP/SBP, the district may wish to consider expanding the contract to include the cost of providing meal service for its pupil placements. However, such meals are not reimbursable under the NLSP/SBP.

If you have any questions regarding this memo, please contact an NSLP specialist.

Tristine Bogle      602-542-8703  
Jennifer Hickey    602-542-8740  
Katrina Klatt      602-542-8711

Allison Boyd      602-542-8705  
Pat Johnson       602-542-8782  
Stacey Patterson   602-542-4815

